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ASSOCIATION OF

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Corporate Business Centre 151 Paseo de Roxas 1226 Makati. Philippines Tel.: (632) 840-3 19 1 to 94 Fax: (632) 8 1 0-35 18

Δ 62159 Δ 25 August 1999

VIA HAND DELIVERY
U.S. Department of Transportation Dockets
Docket No. [FAA-1999-5836] ー イラ
400 Seventh Street SW
Room Plaza 401
Washington, DC 20590

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RE: Notice 99-09, NPRM Part 145 Review: Repair Stations

The Association of Asia Pacific Airlines (AAPA) respectfully submits this Request for Extension of Time for Comments to Docket No. FAA-1999-5836 under 14 C.F.R. §11.29c, in response to Notice 99-09.

The AAPA is the trade association representing major air carriers based in the Asia Pacific region. Its members include: Air New Zealand, Air Niugini, All Nippon Airways, Ansett Australia, Asiana Airlines, Cathay Pacific Airways, China Airlines, EVA Airways, Dragonair, Garuda Indonesia, Japan Airlines, Korean Air, Malaysia Airlines, Philippine Airlines, Qantas Airways, Royal Brunei Airlines, Singapore Airlines, Thai Airways International, and Vietnam Airlines.

AAPA member carriers are reliant upon repair stations already certificated under Part 145, and other contract sources that would now be covered under the proposed rule. These facilities all would be affected by the changes set forth in the Part 145 Review. Additionally, our member carriers operate FAA-certificated repair facilities. The AAPA, therefore, has a substantive interest in this proposed rule.

Due to the scope and depth of material covered and data provided by the FAA in the proposed rule, substantial time is required to analyze and develop meaningful feedback on its content. The AAPA has provided the NPRM to its members and is seeking their substantive comments. However, the 120-day comment period provided in Notice 99-09 is not likely to be sufficient to allow the AAPA to provide thoughtful, integrated comments from its members to the FAA.

Accordingly, we respectfully request that the FAA extend the comment period by at least 60 days, to a period of 180 days from the date on which the NPRM was released. The AAPA is grateful for your consideration of our request.

Singerely

Leroy A. Keith

**Technical Director** 

cc: Mr. Jon F. Ash

Dr. Melissa J. Loughlin Global Aviation Associates, Ltd. 1800 K St., NW, Suite 1104 Washington, DC 20006

Fax: 202-833-3183